



Environmental Management, Inc.
SBC, SWBT Oklahoma, CC 00-217

November 6, 2000

RECEIVED

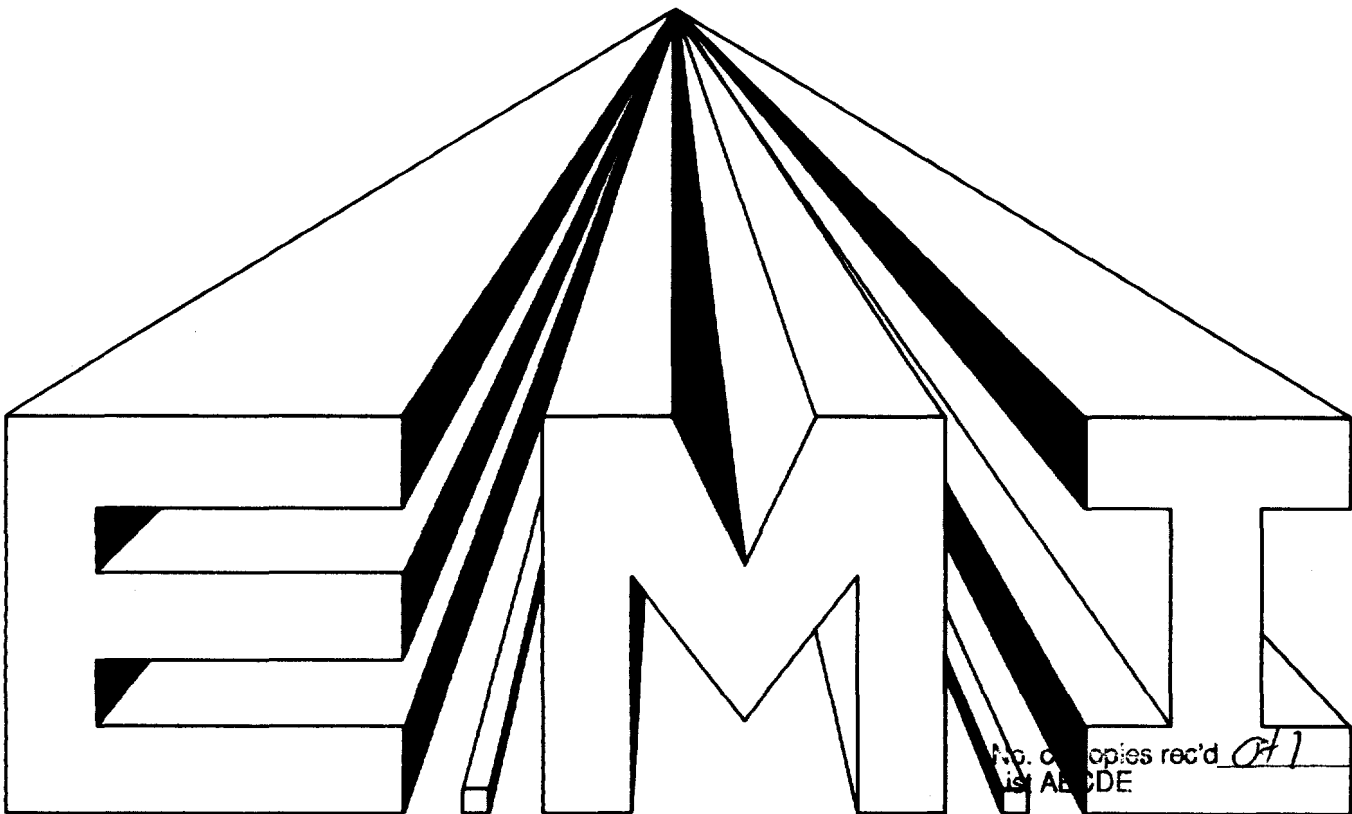
NOV 13 2000

FCC MAIL ROOM

Federal Communication Commission
Commission Secretary
Magalie Roman Salas
445 12th Street SW
Cy-B402
Washington D.C. 20554

Ref: SBC Oklahoma 271 Application, CC Docket No. 00-217, **Motion to Dismiss**

Environmental Management, Inc.



"For an environment we can all live with today & tomorrow."

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November 6, 2000

Environmental Management, Inc.
SBC, SWBT Oklahoma, CC 00-217

Federal Communication Commission
Commission Secretary
Magalie Roman Salas
445 12th Street S.W.
CY-B402
Washington, D.C. 20554

Ref: 271 Application, CC Docket No. 00-217, **Motion to Dismiss -- Opposition**

Subject: SWBT Oklahoma Long Distance Service Application and SBC Substandard national Operational Performance with Location Discrimination

Southwestern Bell Telephone (SWBT) of Oklahoma, a part of South Bell Corporation (SBC), is non-compliant in providing adequate facilities, support of national defense and promotion of safety of life.

SWBT has recently submitted an application to provide long distance services. Their past performance does not warrant approval of their application. The following defines a motion to dismiss based on SWBT/SBC's:

- Substandard Facilities
- Lack of Diverse Routing
- Location Discrimination

The SBC outage report of 98-189 (Tab 2.8) directly shows their non-compliance by the large number of cities (40 slaved Central Offices, cellular service, pagers and 911) that were totally disabled for three (3) hours because of a fiber cut near the master Central Office. With adequate facilities this outage would not have taken place; after the outage SWBT disregarded the impact to national defense and safety of life by not implementing and conforming to industry standards for adequate facilities. SBC long ago agreed to the performance standards by operating as a telecommunications company in the United States. The failure to acknowledge and correct the operational deficiency is presented in the four (4) meeting agendas/minutes with SWBT staff (Tab 2.1). Environmental Management, Inc. submitted the follow-on FCC Enforcement Complaint IC99-C833 (Tab 2) based on national industry standards and what other SWBT states received, with smaller outages. The recent SWB verbal response to the complaint in which the incorrect fix at the incorrect location was presented (Tab 3.2). The recent Guthrie Communications outage (Tel, Cellular & 911) of 10-29-00 for two hours supports the need for correction; this is based on information from local TV news (Oklahoma City) coverage, the Guthrie Police Department and 911 PSAP personnel. This information was requested from SWBT on 11-2-00



Every customer in the nation supports the nation's standards and its on-going maintenance requirements with taxes and monthly billing. SBC (SWBT) has actively established and reviewed this operational industry standard (ANSI, NRIC, NRSC, ATIS & T1) in close participation with other telecommunications companies (Tab 5.2). Each year the standard is revised and approved by the industry members (SBC) and submitted to the FCC.

Oklahoma is a central link to the nation's communication system. SWBT has failed to perform the corrective measures to the present deficient infrastructure (Tab 3.2 & Tab 4.3 – diverse systems and routing). *SWBT's request to provide long distance service will only place service on inadequate facilities and with management that is reactive to problems rather than proactive* (Tab 4.2 & 5.1 p1). **Once SWBT has corrected their operational and infrastructure deficiencies to be fully in compliance with the FCC, national standards and obtained an outstanding or excellent compliance grade with the US Code Title 47 Sec. 151, then and only then should SWBT Oklahoma become a part of the long distance system.**

SBC has the nation's highest fiscal year rate of operational and infrastructure failures in the industry that is reported to the FCC (Tab 4.1). (SBC has a three (3) year fiscal average of 44.3 outages per year and 40% of the outages of second and third place companies.) The three major long distance carriers, MCI World Com, AT&T, and Sprint, combined three (3) year fiscal average of 47.3 outages is only three (3) outages above SBC's record of 44.3, (Tab 4.1 p2). This is a dramatic issue when a single carrier's outages (SBC) exceed the combined outages of the three (3) largest long distance carriers. On a yearly basis, SBC still holds the national lead, the exception is an eleven (11) outage lead by US WEST in fiscal year 1999.

SBC repeatedly claims in SWBT outage reports to the FCC that it complies with the nation's "Best Practices," and "ATIS" and that "SWB observes those practices that are consistent with providing outstanding customer service." Network Reliability Steering Committee's (NRSC) annual report for fiscal year 1999 makes a very clear statement about the "lack of facility diversity – a violation of Best Practices and industry standards that are of such concern" (Tab 5.1). Note: SBC has two (2) Network Reliability Steering Committee members and seven (7) others as team members, six (6) (two from Ameritech) on the "Facilities Solution Team;" one definitely has to ask why is Oklahoma non-standard (Tab 5.2). The NRSC Report covers the time frame when SBC leads the nation with the highest single outage rate to date. With full compliance to the standards, SBC would have two-thirds fewer outage reports presented to the FCC.

The facts of the 98-189 outage report taking place with the failure to report it correctly (i.e., no evaluation of diverse routing and diverse systems), and then to claim the incorrect repair as the fix **is a disregard to public interest and necessity** (Tab 3.2). SBC and SWBT claim outstanding performance to its customers, but fail to perform to the industry basic standards that insure adequate facilities (Tab 4.1). Comparing "The Steps Taken to Prevent Recurrence" of each SWBT Oklahoma outage report to any of the other states where SWBT operates clearly shows the disregard of SWBT Oklahoma to the national standards (Tab 4.3). SWBT operations in other states are much more proactive and supportive of their consumers than their operations in Oklahoma (Tab 4.3 non-Oklahoma).

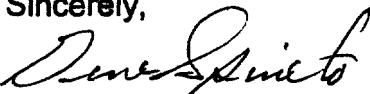
The SBC / SWBT 98-189 outage report hides the fact of non-compliance to the nation's standards; however, they repeatedly declare outstanding customer service (Tab 2.8 & 4.1). This outage (98-189) would never have taken place if basic compliance to the national telecommunications standards were in place at SWBT Oklahoma. SBC's has nearly 10,000 SONET rings (diverse system for fiber) in place throughout their territory. Surely at least one (1) more could be made available to Oklahoma City (Tab 6), U.S. Code Title 47, Ch. 5, Sub Ch. II, Section 202 clearly states that "it is unlawful for any carrier to provide discriminatory facilities, practices or services" or "to give undue preferences to a locality." It is evident that the SWBT Oklahoma outage reports (Tab 4.1) did not receive the same attention or response, as did all other SWBT states (Tab 4.2 & 4.3).

Data for these references is taken from 110 SBC outage reports during the period from January 1998 to October 2000 at www.fcc.gov/oet/outage/. The most significant issues are:

1. Only Oklahoma has five (5) or more chained CO outages when other states' CO's will **isolate** (Tab 7).
2. Only Oklahoma had two (2) fiber cuts serving the same geographic region within less than four (4) months (95 days) and yet still did not address the need of diverse routing. The first cut impacted 44,800 customers and caused fourteen (14) CO failures; the second cut impacted 37,000 customers and caused 29 CO failures, with no record of CO isolation (outage reports 98-45 and 98-96).
3. In all other states where SBC / SWBT operates they take an active roll in "Diversifying routes and Hardware" for fewer customers (Tab 4.2).

SWBT Oklahoma's discriminatory management practices have placed an unjust disadvantage on the citizens of Oklahoma and degrade Civil Defense, safety of life and property. U.S. Code Title 47, Ch. 5, sections 271 (d), 3, c and c 2 (i) 911 service, denying the 271 request is consistent with the public interest, convenience and necessity. To allow SWBT Oklahoma to become a long distance link with a proven disregard to the nation's defense and safety of life is irresponsible and discriminatory. The outage reports confirm the discrimination endured by Oklahoma consumers. The reports further show SWBT's blatant disregard for national and industry standards that insure public interest, civil defense, safety of life and property and equality of service.

Sincerely,



Gene Spineto
Telecommunications Manager
Fax: (405) 282-8533



Environmental Management, Inc.

"For an environment we can all live with today & tomorrow."

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

July 14, 1999

99-C833

FCC
Common Carrier Bureau
Enforcement Division
Consumer Protection Branch
Mail Stop 1600-A2 (Ms. Fisher)
Washington, D.C. 20554

Subject: E.M.I. time line of events since November 18th communications mass outage in Northern Oklahoma.

Ms. Fisher:

First off, thank you for returning my phone calls quickly and answering my question, I do appreciate your professional service.

Tab 1

Has information on the four meetings with Southwestern Bell, the attendees and pre-meeting agenda items. The results of the four meetings: No alternate routing (even for 911 in Guthrie, however one change, Edmond is now supporting Guthrie 911 past was OK city), SWB does not do Priority Phone service for Civil Defense or Police (Guthrie).

After the fourth meeting everyone agreed we are back to the beginning; no change for Guthrie Central Office (CO), the CO is a slave to Master CO 30 miles away and will not allow Guthrie CO to stand alone. There is at least one major CO (Edmond) and thirty miles between Oklahoma City to Guthrie.

Tab 2

Map of Guthrie and Oklahoma City

Tab 3

February 9th Letter to Oklahoma Attorney General and Secretary of State: on problems and solutions to life threatening outages.

Tab 4

Response from Attorney General of Oklahoma, passing the issues on to another department.



1 of 2

E.M.I.

Post Office Box 700
Guthrie OK 73044-0700
(405) 282-8510



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SBC/SWBT Oklahoma CC00-217

Tab 5

March 3rd letter, response from the Governor of Oklahoma: passing this to Corporation Commission.

Tab 6

May 3rd Letter to Corporations Commission: After a quick review of FCC regulations and telecommunication standards, Oklahoma does not meet the FCC / industry standards.

May 13th Letter of February 9th, that was sent to Attorney General and Secretary of State sent to Corporation Commission as a follow up, see Tab 3

May 21st Letter from May 3rd was sent as a reminder.

June 1st Filed a telephone complaint with FCC Common Carrier Bureau of Enforcement about Southwestern Bell failure to have priority settings and ring routing for Guthrie. This info was passed to Denise Bode of the Corporation Commission.

Tab 7 Empty

Written response from Corporation Commission: none.

Three phone calls: one on June 2 from Kevin Knutson of Commissioner Bode's office. Second on June 6th from Kevin saying this would be passed to Steve Welts and that Steve would be out of town until June 25. Third phone call on July 8th from Steve Welts for the first time and he stated cellular is unregulated, he also agreed SWB is behind in ring routing. Steve stated that he was not up to speed on this subject of FCC requirements, but did attend a conference that discussed this. He also stated that time allocation for this has to be requested from Dennis Bode's office.

Tab 8

Outage report filed by SWB and the ones from other states from SWB, note the reference to ring routing. SWB under Best Practices claims to observe the ATIS standards of February 1996, which include alternate/ ring routing; however, it's obvious that had ring routing been in place in Central Oklahoma we would not have experienced the major outage that we did on November 18th. Guthrie CO should have been able to stand alone as well as Edmond CO.

Sincerely

Gene Spineto
Telecommunications Manager



242

E.M.I.

Post Office Box 700
Guthrie OK 73044-0700
(405) 282-2510

12-3-98 First meeting with SWB: Jeff McKee SWB, John Lewis Logan County Civil Defense, Gene Spineto E.M.I.

Agenda items:

1. Outage
2. Cell phone
3. Priority setting
4. Ground start problems

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

12-15-98 Second meeting with SWB: Jeff McKee SWB, Jan Cooley SWB, John Lewis Civil Defense, Guthrie Police Major Downs, Communications Service Betty Wooldridge and Rolly Beardsley, Gene Spineto E.M.I., Jackie RSVP no show.

Agenda items:

1. Outage, one pay phone was working?
2. Alternative Communications
 - Disaster routing, SWB said additional cost for service. Still same CO has no value as true alternate route
3. Cell phone problems
 - SWB technicians had to use Guthrie Police cell phone to call SWB
4. Cell phone priority
5. Guthrie phone system inoperative, request for escalation list from SWB

1-14-99 Third meeting with SWB: Jan Cooley SWB, Gene Clark SWB, John Lewis Civil Defense, Guthrie Police Major Downs, Gene Spineto E.M.I. SWB 911 person CX.

Agenda items:

1. Pagers also out of service
2. Recovery priority for Guthrie CO, Police, Civil Defense, E.M.I., RSVP answering service, see # 5.
3. Told of fiber ring going in which should give Guthrie CO back up route
4. Guthrie CO is a slave to OK city CO, Green field
5. Priority phone setting for SWB is not a provided/ service of SWB

2-2-99 Fourth meeting by conference call from SWB, Jan Cooley SWB, Gene Sparks (911) SWB, Preston McPhail SWB. John Lewis Civil Defense, Guthrie Police Major Downs, Communications Service Betty Wooldridge, Gene Spineto E.M.I.

Agenda items:

1. Fiber re-route is not for Guthrie
2. Alternate/Diverse routing the only chance for Guthrie (SWB)
3. Preston to meet with John for a lunch meeting next week with info on CO standing alone, see note below
4. **Everyone agrees we have returned to square one, no change and accidents will happen.**

Item 3, meeting never happened nor was the information ever passed to John Lewis, according to John (Have had two conversations with John as follow up on this since June 8, 1999 was last conversation).

Date: 3 December 1998

9:30 - 10:40

Agenda items with Southwestern Bell and EMI.

Attendees;

JEFF McKEE, JOHN LEWIS, GENE SPINETO
SWBELL GUTHRIE CIVIL DEFENSE EMI.

1. EMI background

Phone equipment, Panasonic Sw, vendor Communication Services

Week day switch over to answering service (RSVP)

2. Phone outage on November 18, 1998.

- Alternative communications
- Answering service (RSVP) is in Edmond, 1720 S. Kelly, Phone 340-2525, contact is Jackie.
- Cell phone problems
ATT PCS
- Guthrie phone system inoperative

3. Ground start history, 4Hr outage

- Switch over is desired *JEFF LOOKING INTO THIS*

4. Future Data line

- ISDN

5. Contacts you would suggest within SWB

*ROSS BRESHEARS (GUTHRIE'S EDMOND AREA)
348 1844*

6. Civil Defense Communication requirements

- John Lewis pH 282-0494

*CELL PHONES WITH
PRIORITY STATUS*

7. Other contacts you would suggest or groups

NEXT MEETING DEC 11 AT 10:00AM

15
December 11, 1998

(SWE)

(SWB)

Agenda items with Southwestern Bell and EMI.

Attendees: HARRY DOWNS (SWB), ROLLY BARNES (COM SC),
PETTY (COM SC), JOHN HEWES (COM SC), GENE (EMI)
* (VICKIE REYRUGH)

1. Phone outage on November 18, 1998.

- Alternative communications
 - Disaster routing service
- Cell phone problems.
- Guthrie phone system inoperative

keep track info
from Jeff

5,000

no cables id
other down

2. Ground start

- Switch over is desired
- EMI and Communications Services need SWB to schedule
 - Dec 7, some problems took place in a one way effort to change to ground start. Communication Services was not allowed to contact needed SWB technicians.
 - Does SWB have the new equipment in which will allow this function; Fiber is cleaner, less noise. Is the alternative back to copper?

in pps - trunk T-1
(integrated pathway 13DN)

3. Vickie Weyrough, (Phone 319-6104) is one of SWB point of contacts for EMI.

4. Future Needs

336 pps

- Cell phones with priority ability

5. Action items for EMI

- Reviewed local long distant bill, copy for Jeff
- Plexar II services for EMI reviewed.
- Com Services phone number to Jeff, 12-3 completed

13DN has long distance change
has from relay.

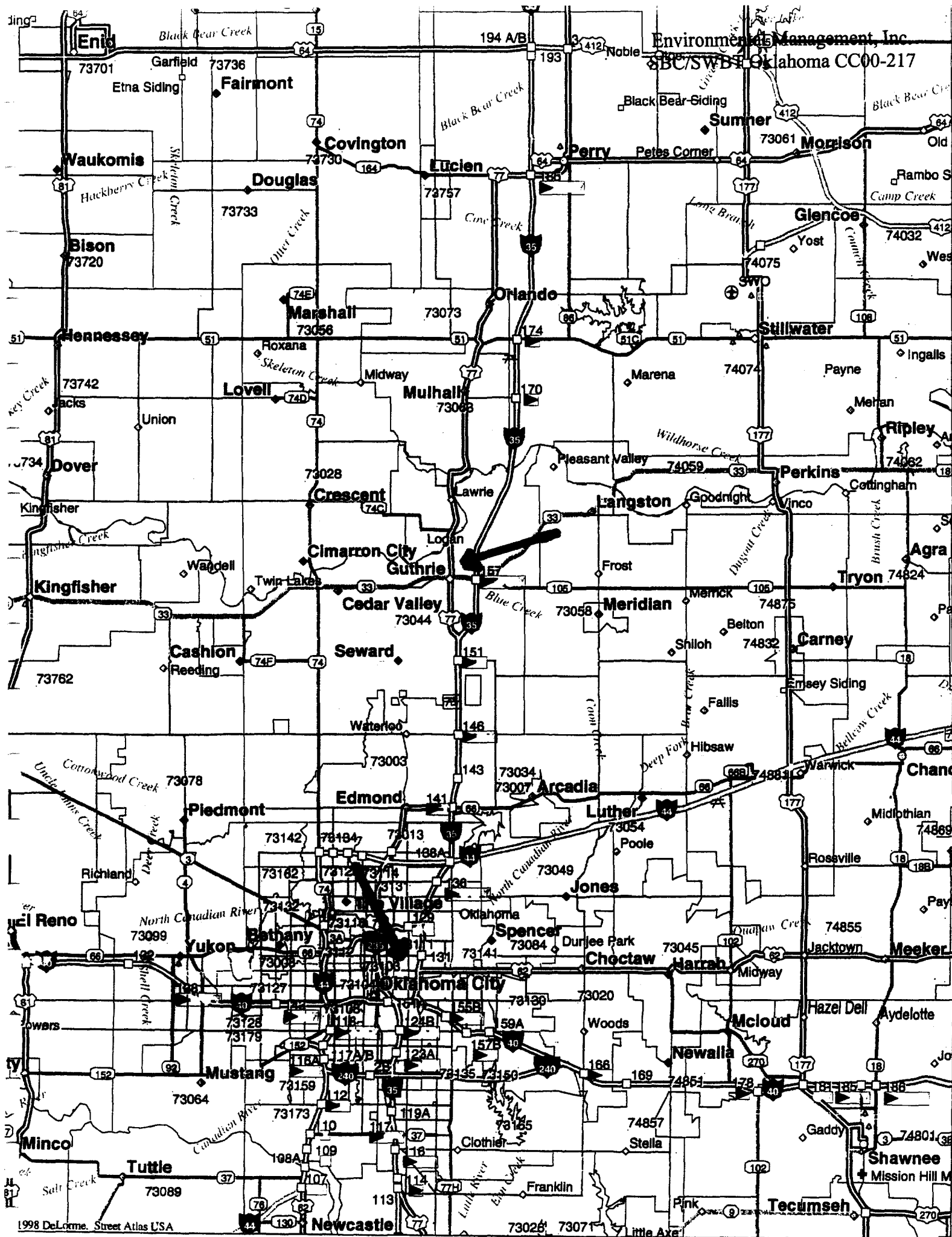
* CALLED AFTER MEETING

Date: 14 January 1999

Agenda items with Southwestern Bell and EMI.

Attendees: *Jan C. Cooley, Jeff McKee, Ted L. [unclear]*

1. Welcome and Congratulations to Jan Cooley of SWB, Ph. 291-2454 as the New Guthrie Rep. Jeff McKee has other assignments. Welcome and thanks for coming out to the other members from SWB.
2. History brief; Major phone outage on Nov 18th Just after 5:00 PM. Cell phones, Central Office in Guthrie and Edmond. Guthrie's Police department and Logan county Civil Defense had to take preventative action. It seems that other counties had the same problems. *pages inop*
3. Open discussion
4. What are the recovery priority settings for: Guthrie's Central Office, Police, Fire, and Civil Defense? Non-government, EMI and RSVP (answering service)?
 - Answering service (RSVP) is in Edmond, 1720 S. Kelly, Ph 340-2525, Contact is Jackie.
5. Uniform call distribution is set by SWB (UCD), is EMI and RSVP in the correct distribution, I need to understand the purpose of UCD or the function?
6. What are the Alternative communications when:
 - Guthrie phone system is inoperative.
 - Cell phone problems (Mobile Phones).
 - Edmond Co is down. OKC is down.
7. Future EMI needs
 - ISDN
8. Logan County and Guthrie Civil Defense is John Lewis Ph. 282-0494



Environmental Management, Inc.
ABC/SWB Oklahoma CC00-217



W. A. DREW EDMONDSON
ATTORNEY GENERAL OF OKLAHOMA

February 18, 1999

Mr. Gene Spineto
Manager Telecommunications
Environmental Management, Inc.
P.O. Box 700
Guthrie, Oklahoma 73044-0700

Re: Request For Oversight Committee

Dear Mr. Spineto:

Thank you for your letter and suggestions. Our office is not directly involved in emergency management and has no jurisdiction over it. I have forwarded your letter to Governor Keating for his review and any action he deems appropriate.

I appreciate hearing from you and hope you will feel free to call me if there is any way I may be of service.

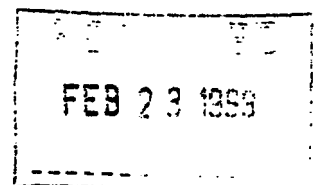
Sincerely,

A handwritten signature in dark ink, appearing to read "W.A. Edmondson", written over a horizontal line.

W.A. DREW EDMONDSON
ATTORNEY GENERAL

WAE:seh

cc: The Honorable Frank Keating
Governor
State of Oklahoma
212 State Capitol Building
Oklahoma City, Oklahoma 73102





Environmental Management, Inc.

"For an environment we can all live with today & tomorrow."

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

9 February, 1999

Attorney General
Drew Edmondson
Room 112
State Capitol
Oklahoma City, OK 73105

Secretary of State
Tom Cole
Room 101
State Capitol
Oklahoma City, OK 73105

Request an Oversight Committee be established to ensure that Civil Defense communications and business contingency communications requirements are being complied with by the phone companies.

Gentlemen:

With the recent landline phone outage on Nov 18, 1998 it was discovered that even cell phone, mobile phone and 911 service was disabled from Edmond to Black Well. The actual fiber line cut took place by Remington Park, well South of Edmond. This terminated all types of phone service, including within the same prefix areas for over three hours. Basic planning requirements should have never allowed this type of single tread design to take place.

Federal Contingency Planning and Civil Defense requirements must have been over looked. Combine this with the different competing phone companies and you will continue to have independent single tread type routing design problems. Eventually it will cascade to larger sustained outages that will have far reaching impacts to basic life emergency services.

To improve Oklahoma's Emergency and Business posturing, recommend the Oversight Committee establish regular-scheduled meetings to review outages and to insure compliance with Oklahoma's Master communications plan.

The Committee would be composed of Civil Defense, Law enforcement, 911 and business personnel. Each communications company would be required to participate. Attendance to the meetings would be open to business and government agencies.

This could be the nation's first; Oklahoma could take the lead in assurance and coordination of its communication to the businesses and State Governments.

There have been a total of four Meetings since the outage. With SWB, Logan County Civil Defense, Guthrie Police and Environmental Management Inc (Nation wide provider of 24 Hr emergency response clean up service). Everyone is trying, but zero head way has taken place and everyone has come to the full conclusion of **NO CHANGE WILL TAKE PLACE IN THE DESIGN OF THE SYSTEM AND THE SERIOUS, TO LIFE THREATENING OUTAGES (911, Cell Phones, Pagers, Mobile Phones and Phones) WILL HAPPEN AGAIN** and again. **Basic design would eliminate this LIFE THREATENING hazard.**

Sincerely yours,


Gene Spineo
Manager Telecommunications



E.M.I.

Post Office Box 700
Guthrie OK 73044-0700
(405) 282-8510



STATE OF OKLAHOMA
OFFICE OF THE GOVERNOR

Wednesday, March 03, 1999

Mr. Gene Spineto
Manager
Environmental Management, Inc.
Post Office Box 700
Guthrie, Oklahoma 73044-0700

Dear Mr. Spineto:

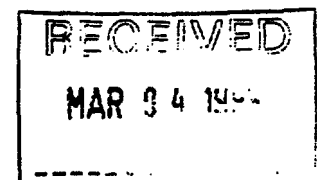
Governor Keating is in receipt of your letter regarding telecommunications problems in Oklahoma. He has asked that I respond on his behalf. Although the Governor is concerned with these issues, the Corporation Commissioner would have more jurisdiction over this type of problem. I have forwarded your letter to Corporation Commissioner Denise Bode's office for investigation and further review.

I appreciate you notifying me of this matter. If there is any way I can be of further assistance, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric J. Polak".

Eric J Polak
Cabinet Liaison & Public Policy Specialist





Environmental Management, Inc.

"For an environment we can all live with today & tomorrow."

May 3, 1999

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

Commissioner Denise Bode
Oklahoma Corporation Commission
2101 Lincoln Blvd
Oklahoma City, OK 73105

Subject: Request for a Meeting on Telecommunications outage and Oklahoma's Future Business Communication Infrastructure Opportunities.

Reference: Governor Keating Letter March 3, 1999, (Eric J Polak) in response to Environmental Management, Inc. (E.M.I.). Letter dated February 9, 1999, regarding Telecommunications Outage November 18, 1998 (attached).

Commissioner Bode:

After quickly reviewing the FCC regulations and Telecommunications Standards adopted by the Telecommunications Industry, it has become very evident that Oklahoma has not met the standard design requirements as other states. With the Network and Telecommunication Revolution in its beginning phase, Oklahoma enjoys a strategic position of great opportunity. Oklahoma's plan ("Building a Better Oklahoma") combined with its geographic location makes our state an attractive location for new businesses and opportunities for the existing business base. This would be a great opportunity for Oklahoma to lead the other states in Telecommunications Infrastructure. The main new marketing addition will be Business Telecommunications Networks Infrastructure, a terrific addition to the present Oklahoma marketing campaign.

To take advantage of this, the state needs to lead and coordinate the planning. (A competing out of state Telecommunications / Network company will naturally have goals that have a different alignment setting than Oklahoma's plan for the future.) To keep the playing ground equal between competing companies and still obtain and improve the standard Telecommunications Networks Infrastructure will require the Corporation Commission's leadership.

Many businesses depend on 24 hour communication and are required by law to have backup systems (Banks, Hospitals, and 911) and in the case of E.M.I. we have contractual commitment to our customers for emergency nation-wide environmental response. Following the Telecommunications industry established standards (FCC, ANSI, ATIS and T-1) will provide for improved Telecommunication service and assurance of reduced major life threatening outages.

When can we meet to address questions you may have, and discuss a comprehensive plan?

Sincerely,

Gene Spineto
Telecommunications Manager



E.M.I.

Post Office Box 700
Guthrie OK 73044-0700
(405) 282-8510

Environmental Management, Inc.

Fax Memo – (405) 282-8533

Voice – (405) 282-8510

To: Denise Bode, Corporation Commission

From: Gene Spineto, EMI 

Date: June 1, 1999

RE: Federal Communications Commission – Common Carrier Bureau of
Enforcement and Southwestern Bell's failures in emergency preparedness

The FCC Office of the Common Carrier Bureau of Enforcement in Washington, DC has been contacted regarding the lack of alternative telecommunications routing and SWB's failure to establish service priorities for emergency situations. The initial response from the Common Carrier Bureau of Enforcement is that Southwestern Bell will receive a fine for failure to have alternate routing (also known as ring routing), as well as for their non-compliance with the National Security Emergency Preparedness-Telecommunication Service Priority system.

I bring these initial findings from the FCC to your attention so you may have a better feeling for the gravity and opportunity that is ahead. I strongly urge you to consider forming a business coalition to address these types of corporate telecommunications issues, as I previously described to you in my previous letters sent to you March 3rd and May 3rd. If you need further background information contact me at 282-8510.

*KEVEN AXIOTSCAL
CALLED 6-2-99 9:34*

Blank

TAB

7

Barbara J. Reeves
Corporate Manager -
Federal Regulatory

SBC Telecommunications, Inc.
1401 I Street, N.W.
Suite 1100
Washington D.C. 20005
Phone 202 326-8852
Fax 202 789-5319

98



98-189

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

December 18, 1998

Mr. Dale Hatfield
Office of Engineering and Technology
Federal Communications Commission
2000 M Street, N.W.
Room 480
Washington, D.C., 20554

Re: Final Service Disruption Report

Dear Mr. Hatfield:

Pursuant to the requirements established in the Report and Order in CC Docket No. 91-273 (Amendment of Part 63 of the Commission's Rules to Provide for Notification by Common Carriers of Service Disruptions), **Southwestern Bell Telephone Company** submits the attached **Final Service Disruption Report** associated with a service disruption at **North Central Oklahoma**, on **November 18, 1998**.

An Initial Service Disruption Report was faxed to the FCC's Monitoring Watch Officer on that date.

Please stamp and return the provided copy to confirm your receipt. Please contact me if you have questions regarding this service disruption.

Sincerely,

Barbara J. Reeves

Enclosures

CC: Bob Kimball

**Southwestern Bell Telephone**Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

Retention Period: 6 Years

FCC SERVICE DISRUPTION REPORT☐ Initial Report☐ Update☒ Final

OCCURRED: DATE: 11/18/98

TIME: 16:58 CST

☒ 50,000 or More Customers☐ 30,000 - 49,999 Customers

ENDED: DATE: 11/18/98

TIME: 21:54 CST

☐ Special Offices/Facilities**GEOGRAPHICAL AREA AFFECTED: North Central Oklahoma****ESTIMATED CUSTOMERS AFFECTED: 121,140****TYPE(S) OF SERVICE AFFECTED: IntraLATA, InterLATA, 800, Interexchange, Switched Access, Cellular and E911****ESTIMATED BLOCKED CALLS: 393,895**

CAUSE OF THE DISRUPTION: At 16:58 CST, on Wednesday, November 18, 1998, Allen Construction Incorporated damaged two fiber toll cables ½ mile North of the Oklahoma City Greenfield Central Office. The fiber toll cables provide toll access for customers in 25 Southwestern Bell Telephone and 15 Independent Company Central Offices north of Oklahoma City. Allen Construction, Inc. was using a trackhoe to tear out a bridge wing wall when they damaged the underground conduit system that contained the fiber toll cables. Allen Construction, Inc. was working on a road construction project for the State of Oklahoma when they damaged the cables. The cables were accurately located and marked per Southwestern Bell Telephone directives.

There was local media coverage of the event. The City of Guthrie Police Department E911 Public Safety Answering Point (PSAP) was affected by the outage. There were no known life threatening events that occurred during the outage.

Root Cause of the outage is Cable Damage – Digging Error.

NAME AND TYPE OF EQUIPMENT INVOLVED: Fiber Optic Cables**SPECIFIC PART OF NETWORK INVOLVED: Toll Network**

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

BEST PRACTICES: Best Practices covering this outage are contained in Section A of the Network Reliability: A Report to the Nation - Compendium of Technical Papers, dated June 1993, and Keeping the Network Alive and Well document from ATIS, dated February 1996. Southwestern Bell Telephone observes those practices that are consistent with providing outstanding customer service.

METHODS USED TO RESTORE SERVICE: Cables were exposed and spliced with mechanical connectors. One cable also suffered an open splice 1/2 mile from the damage site. Service on the cable with the open splice was patched to the other cable.

STEPS TAKEN TO PREVENT RECURRENCE:

1. A claim for damages was processed and Allen Construction, Inc. was rendered a bill.
2. A meeting to discuss "Cable Damage Prevention" initiatives was held with Allen Construction, Inc. by Southwestern Bell Telephone personnel.
3. The Southwestern Bell Telephone cable locate contractor has an employee assigned to the project who will be on site whenever there is construction activity near the fiber optic toll cables.

PREPARED BY: Jim Lankford
DATE SUBMITTED: 12/17/98

TELEPHONE: 210-886-4589
TIME: 10:30 CST



Barbara J. Reaves
Corporate Manager -
Federal Regulatory

SBC Telecommunications, Inc.
1401 I Street, N.W.
Suite 1100
Washington D.C. 20005
Phone 202 326-8852
Fax 202 789-5319

98-2041

December 23, 1998

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

Mr. Dale Hatfield
Office of Engineering and Technology
Federal Communications Commission
2000 M Street, N.W.
Room 480
Washington, D.C., 20554

Re: Final Service Disruption Report

Dear Mr. Hatfield:

Pursuant to the requirements established in the Report and Order in CC Docket No. 91-273 (Amendment of Part 63 of the Commission's Rules to Provide for Notification by Common Carriers of Service Disruptions), **Southwestern Bell Telephone Company** submits the attached **Final Service Disruption Report** associated with a service disruption at **Tyler, Texas on December 9, 1998.**

- An Initial Service Disruption Report was faxed to the FCC's Monitoring Watch Officer on that date.

Please stamp and return the provided copy to confirm your receipt. Please contact me if you have questions regarding this service disruption.

Sincerely,

Barbara J. Reaves

Enclosures

CC: Bob Kimball



Southwestern Bell Telephone

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

Retention Period: 6 Years

FCC SERVICE DISRUPTION REPORT

☐ Initial Report

☐ Update

☒ Final

OCCURRED: DATE: 12/09/98

TIME: 09:31 CST

☒ 50,000 or More Customers

☐ 30,000 - 49,999 Customers

ENDED: DATE: 12/09/98

TIME: 12:40 CST

☒ Special Offices/Facilities

GEOGRAPHICAL AREA AFFECTED: Tyler, Texas

ESTIMATED CUSTOMERS AFFECTED: 86,139

TYPE(S) OF SERVICE AFFECTED: IntraLATA, InterLATA, Interexchange, Switched Access and E911

ESTIMATED BLOCKED CALLS: 201,884

CAUSE OF THE DISRUPTION: At 09:31 CST, on Wednesday, December 9, 1998, Red Simpson, Incorporated damaged a fiber toll cable in conduit while using an auger to place a power pole for TU Electric at the intersection of Fair Lane and Sunnybrook in Tyler, Texas. The fiber toll cable provides toll access for customers in 3 Southwestern Bell Telephone and 1 GTE Central Office in east Texas. In addition, the GTE Central Office serves as the E911 Tandem for GTE offices in east Texas.

A cable locate had been requested and a copper cable was located by SM&P (Southwestern Bell Telephone cable locate contractor). However, they failed to locate and mark the conduit run that contained the fiber toll cable.

There was local media coverage of the event. There were 16 Public Safety Answering Points (PSAP's) affected by the outage. 911 calls were automatically transferred to 7 digit numbers, per GTE Contingency Plans, for those GTE offices that had that capability. There were no known life threatening events that occurred during the outage.

Root Cause of the outage is Cable Damage due to Cable Unlocated (Dig-Up)

NAME AND TYPE OF EQUIPMENT INVOLVED: Fiber Toll Cable

SPECIFIC PART OF NETWORK INVOLVED: Switched Access and E911

BEST PRACTICES: Best Practices covering this outage are contained in Section A of the Network Reliability: A Report to the Nation - Compendium of Technical Papers, dated June 1993, and Keeping the Network Alive and Well document from ATIS, dated February 1996. Southwestern Bell Telephone observes those practices that are consistent with providing outstanding customer service.

METHODS USED TO RESTORE SERVICE: Damaged fibers were fusion spliced.

STEPS TAKEN TO PREVENT RECURRENCE:

1. A claim for damages was processed and SM&P was rendered a bill.
2. A diversity route was evaluated, approved and an economic decision will be made when to fund the project.
3. A partnership was agreed to by Southwestern Bell Telephone management and SM&P whereby a Southwestern Bell Telephone manager would ride with new SM&P locators to insure they knew what where considered "high profile" cable routes.

PREPARED BY: Jim Lankford
DATE SUBMITTED: 12/22/98

TELEPHONE: 210-886-4589
TIME: 09:00 CST

Barbara J. Reeves
Corporate Manager -
Federal Regulatory

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Washington D.C. 20005
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99-



99-51

May 10, 1999

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

Mr. Dale Hatfield
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, N.W.
Room 7-A-340
Washington, D.C., 20554

Re: Final Service Disruption Report

Dear Mr. Hatfield:

Pursuant to the requirements established in the Report and Order in CC Docket No. 91-273 (Amendment of Part 63 of the Commission's Rules to Provide for Notification by Common Carriers of Service Disruptions), **Pacific Bell** submits the attached **Final Service Disruption Report** associated with a service disruption in **Santa Clara, California on April 9, 1999.**

An Initial Service Disruption Report was faxed to the FCC's Monitoring Watch Officer on that date.

Please stamp and return the provided copy to confirm your receipt. Please contact me if you have questions regarding this service disruption.

Sincerely,

Barbara J. Reeves

Enclosures

CC: Bob Kimball

99-51

FINAL SERVICE DISRUPTION REPORT

Environmental Management, Inc.
SBC/SWBT Oklahoma CC00-217

CATEGORY: 30,000+

REPORTING COMPANY: Pacific Bell

REPORT NUMBER: 990294

REPORT CONTACT/TELEPHONE: Ken Walling 510-645-5000

LOCATION OF DISRUPTION: Santa Clara, California

1. DATE AND TIME OF THE INCIDENT:

Date: 4/9/99

Time: 0915 Hours

2. GEOGRAPHIC AREA AFFECTED:

This service disruption occurred in the median of a major expressway located in the city of Santa Clara and affected some of the customers served by the 408 Area Code. The city of Santa Clara and the affected area are located in the San Francisco, California LATA 722.

3. ESTIMATED NUMBER OF CUSTOMERS AFFECTED:

Pacific Bell estimates that approximately 43,000 customers could have been affected by this disruption. This estimate was calculated using the method recommended by the Threshold Reporting Group (TRG) and is based on the quantity and type of trunks (message/special) lost when the event occurred.

4. TYPES OF SERVICES AFFECTED (e.g., Interexchange, Local, Cellular):

Local and Interexchange services were affected.

9-1-1 service was not affected and there were no Public Service Answering Points (PSAPs) isolated by this disruption.

5. DURATION OF THE OUTAGE:

Date and Time of disruption: 4/9/99 @ 0915 Hours

Date and Time of full service restoration: 4/10/99 @ 1330 Hours

Duration of incident (minutes) 1848

30.8 HRS

6. ESTIMATED NUMBER OF BLOCKED CALLS:

Approximately, 34,145 calls were blocked during this incident. This estimate is based on data taken from the same day and time of the week following the incident.

7A. ROOT CAUSE OF THE INCIDENT:

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SBC/SWBT Oklahoma CC00-217

There are two root causes of this service disruption. The first root cause was the failure to verify the presence or absence of underground facilities by the technician of Underground Technology, Inc. (UTI). UTI is a subcontractor for Pacific Bell responsible for providing assistance to the Underground Service Alert (USA) organization. The construction crew began a horizontal bore beneath the expressway surface after receiving two statements from the UTI technician that there were no conflicting underground facilities at the location of the dig. Consequently, the auger destroyed a cable duct and severed three fiber optics cables and an 1100-pair copper cable.

The second root cause was the lack of a usable tool that provides accurate maps of all underground facilities in a usable format. The lack of such a tool was responsible for the selection of two fiber optics cables to form a Synchronous Optical Network (SONET) ring. The cable records available to the planners only showed that the two cables had different A (start) and Z (end) locations. The planners believed, based on these inadequate details, that the cables selected lay in diverse paths such that an incident of damage to one cable would not result in the loss of service on the other cable. In fact, the cables were in the same conduit and when the auger damaged that conduit both fiber cables were severed which resulted in the loss of service.

This service disruption occurred during a work activity by a construction crew working for the city of Santa Clara. The crew was using an auger to bore horizontally beneath the surface of the expressway. In preparation for digging at this location, the construction company called UTI twice to determine, then to confirm that the planned dig did not conflict with underground structures or facilities.

After being cleared by the UTI technician, the construction crew began to bore beneath the expressway surface. The auger struck and severed an 1100-pair copper cable. Nonetheless, the construction crew did not know this. Therefore, the crew changed the auger bit to a larger size and the work was continued. The larger size bit then struck, severed and pulled three fiber optics cables from the duct structure. Two of the fiber cables formed the SONET ring configuration and the third was dedicated to a single customer.

When the auger damage occurred, many fiber systems with protection fiber cables routed in diverse paths automatically switched to protection without loss of service. However, five SONET Ring systems were designed using the fiber cables that were believed to be diversely routed but were not. Service on those systems was lost, as was service on the copper cable.

Two factors contributed to the length of the outage by delaying the start of the effort to restore service. First, when the trouble was isolated to a copper span, the Network Operations Center (NOC) instructed the Line Field Organization (LFO) to contact the Cable Maintenance to notify them of the trouble thinking that Cable Maintenance had the information they needed to resolve the trouble. It has been determined that neither the NOC, LFO or Cable Maintenance organizations have access to the specific

information that is required to provide timely fault isolation and restoration of copper cables. Lack of information hampered the restoration efforts in this failure.

Second, the reporting system for the NOC did not respond as expected when the fiber cables failed. Only four tickets should have been generated to pinpoint the affected cables and the remaining tickets squelched. However, 248 tickets were generated which made it difficult to discern which tickets contained the necessary information. As a result, the ability to accurately identify all affected cables was hampered. This caused further delay in the actual effort to restore service. In addition, the failure of the cable that was dedicated to a single customer was not identified until 4/10/99 at approximately 0500 Hours.

7B. NAME AND TYPE OF EQUIPMENT:

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Name: Fiber Optics Cables/Copper Cable
Type: NA
Generic: NA
Vendor: NA

7C. SPECIFIC PART OF THE NETWORK AFFECTED (e.g., Loop, Local Switch, Interoffice):

This incident affected the interoffice and loop portion of the network.

8. METHOD(S) USED TO RESTORE SERVICE:

Cable Maintenance personnel drove to the area, located the construction site and applied tone to the cables to determine the exact location of the damage. Once the location was determined Cable Maintenance began pulling in replacement cables and completed this at approximately 1430 Hours at which time the technicians began to patch the cables.

The NOC and LFO were working a parallel process to restore traffic by moving the affected OC48 SONET add drop multiplexers (ADMs) on to spare fiber cable pairs to reroute them around the failure. They were successful in restoring service in an on-going manner. The first ring was restored at 1500. At 1715 service was restored for all five OC48 rings.

The copper cable that was severed was spliced and restored to service on 4/10/99 at 0700.

The two fiber cables with which the SONET ring was configured were restored at 0200 hours and 0700 hours.

The dedicated cable was replaced on 4/10/99 at 0500 Hours and service was restored on 4/10/99 at 1330 Hours and represented full restoration.

9. **STEPS TAKEN TO PREVENT RECURRENCE OF THE
OUTAGE:**

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The following steps have been or will be taken to prevent recurrence of this outage:

As of 4/12/99, the UTI technician involved in the failure was terminated and all UTI technicians reviewed the processes and responsibilities for locating underground cables.

Pacific Bell is conducting a feasibility study to determine the cost effectiveness of developing an automated, centrally located tool for accessing cable records. The tool will include: 1) Accurate street maps (updateable) entered into a Computer Aided Design (CAD) system, 2) an overlay of the conduit routes on the map and 3) an overlay of the fiber optics cable on the conduit. This tool will provide the actual conduit (physical) path that the fiber is taking to provide the planners a way to accurately engineer and maintain physical diversity. The study was started on 5/4/99.

The NOC issue with the ticketing systems was due to a missing "filter rule." This was corrected in both the North and South NOCs by 5/3/99.

As of 5/7/99, the NOC enhanced procedures specific to cable failures to establish parallel contacts with Cable Maintenance and the LFO to expedite isolation and recovery efforts. Additionally, a team comprised of LFO, NOC, and Cable personnel will meet the week of 5/24/99 to review the information that Cable Maintenance needs to identify and resolve copper cable damage, identify where that information is located, and how the information is accessed and procedures will be developed to communicate this information to Cable Maintenance.

10A. **APPLICABLE BEST PRACTICE(S):**

Pacific Bell reviewed the Network Reliability: A Report to the Nation, June 1993, and evaluated all recommendations and best practices by focus areas. Based on the root cause analysis the most appropriate focus areas are:

Fiber Optic(s) Cable Dig-Ups:

Reference 6.1.1.2 - Call Before You Dig

Reference 6.1.1.3 - Locate the Cable

E911 Focus Group Report:

Reference 6.1.1 Diverse Routing of Interoffice Facilities

10B. **BEST PRACTICE(S) USED:**

Fiber Optic(s) Cable Dig-Ups:

Reference 6.1.1.2 - Call Before You Dig

Reference 6.1.1.3 - Locate the Cable

E911 Focus Group Report:

Reference 6.1.1 Diverse Routing of Interoffice Facilities

10C. ANALYSIS OF EFFECTIVENESS OF BEST PRACTICES:

Fiber Optic[s] Cable Dig-Ups:
Reference 6.1.1.2 – Call Before You Dig

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Analysis: The Call Before You Dig process was used in this instance. However, the process was not carried out completely because the technician did not locate the cable. If the technician had located the cable this disruption may have been prevented.

Fiber Optic[s] Cable Dig-Ups:
Reference 6.1.1.3 – Locate the Cable

Analysis: This recommendation states that "It is the facility owner's responsibility to respond to cable locate requests and to promptly and accurately establish and mark cable route location." This recommendation was used but improperly executed. If the UTI technician had followed the procedure in place, this failure may have been prevented.

E911 Focus Group Report:
Reference 6.1.1 Diverse Routing of Interoffice Facilities

Analysis: This recommendation calls for the application of diversity architecture with 1-by-1 facility transport systems and diverse path protection. In this scenario, service is protected by a standby protection facility that is diversely routed from the working facility. This is the architecture that was believed to have been in place based on the originating (A) and terminating (Z) locations indicated on the facilities map for the fiber cables. Unfortunately, details regarding the conduit used by these cables were not available and instead of being diverse, both the working and protection fibers were in the same conduit. If the fibers had actually been in diverse paths, this disruption may have been averted.